

Patrick J. Neligan, Jr.  
State Bar. No. 14866000  
Douglas J. Buncher  
State Bar No. 03342700  
John D. Gaither  
State Bar No. 24055516  
**NELIGAN LLP**  
325 North St. Paul, Suite 3600  
Dallas, Texas 75201  
Telephone: 214-840-5333  
Facsimile: 214-840-5301  
[pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com)  
[dbuncher@neliganlaw.com](mailto:dbuncher@neliganlaw.com)  
[jgaither@neliganlaw.com](mailto:jgaither@neliganlaw.com)

Gregory E. Garman  
Nevada Bar No. 6654 (*admitted pro hac vice*)  
William M. Noall  
Nevada Bar No. 3549 (*admitted pro hac vice*)  
Gabrielle A. Hamm  
Texas Bar No. 24041047  
**GARMAN TURNER GORDON LLP**  
7251 Amigo Street, Suite 210  
Las Vegas, Nevada 89119  
Telephone: 725-777-3000  
Facsimile: 725-777-3112  
[ggarman@gtg.legal](mailto:ggarman@gtg.legal)  
[wnoall@gtg.legal](mailto:wnoall@gtg.legal)  
[gahamm@gtg.legal](mailto:gahamm@gtg.legal)

**COUNSEL FOR THE DEBTORS**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	§	<b>CHAPTER 11</b>
	§	
<b>NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,</b>	§	<b>CASE NO. 21-30085-hdh11</b>
	§	
<b>DEBTORS<sup>1</sup></b>	§	<b>Jointly Administered</b>

---

**NOTICE OF RESET HEARING**

**PLEASE TAKE NOTICE** that a hearing on the following pleading has been reset for  
**Wednesday, March 17, 2021 at 2:00 p.m. Central Time** before the Honorable Harlin D. Hale:

1. Debtors' Motion for Waiver of the Requirements of Section 345(b) [Docket No. 78].

**PLEASE TAKE FURTHER NOTICE** that this hearing will be conducted by  
videoconference and teleconference via Webex. To access Judge Hale's Courtroom for the  
hearing use the following link: <https://us-courts.webex.com/meet/hale>. Parties wishing to

---

<sup>1</sup> The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

participate via teleconference may dial-in at 1-650-479-3207, access code 476 420 189. Parties attending the hearing are requested to include their names on the Court's electronic sign-in sheet located on Judge Hale's web page under "Electronic Appearances" located at the following link: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-hales-hearing-dates>. Parties should also review, prior to the hearing, the Webex Hearing Instructions attached hereto.

Dated: March 10, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.

Patrick J. Neligan, Jr.

State Bar. No. 14866000

Douglas J. Buncher

State Bar No. 03342700

John D. Gaither

State Bar No. 24055516

**NELIGAN, LLP**

325 North St. Paul, Suite 3600

Dallas, Texas 75201

Telephone: 214-840-5333

Facsimile: 214-840-5301

[pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com)

[dbuncher@neliganlaw.com](mailto:dbuncher@neliganlaw.com)

[jgaither@neliganlaw.com](mailto:jgaither@neliganlaw.com)

and

Gregory E. Garman

Nevada Bar No. 6654 (*admitted pro hac vice*)

William M. Noall

Nevada Bar No. 3549 (*admitted pro hac vice*)

Gabrielle A. Hamm

Texas Bar No. 24041047

**GARMAN TURNER GORDON LLP**

7251 Amigo Street, Suite 210

Las Vegas, Nevada 89119

Telephone: 725-777-3000

Facsimile: 725-777-3112

[ggarman@gtg.legal](mailto:ggarman@gtg.legal)

[wnoall@gtg.legal](mailto:wnoall@gtg.legal)

[ghamm@gtg.legal](mailto:ghamm@gtg.legal)

**COUNSEL FOR THE DEBTORS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 10<sup>th</sup> day of March 2021, a true and correct copy of the foregoing was served via first class U.S. mail on the parties named on the attached Master Service List.

/s/ John D. Gaither

John D. Gaither

## **WebEx Hearing Instructions**

### **Judge Harlin D. Hale**

Pursuant to General Order 2020-14 issued by the Court on May 20, 2020, all hearings before Judge Harlin D. Hale are currently being conducted by WebEx videoconference unless ordered otherwise.

#### **For WebEx Video Participation/Attendance:**

Link: <https://us-courts.webex.com/meet/hale>

#### **For WebEx Telephonic Only Participation/Attendance:**

Dial-In: 1-650-479-3207

Access code: 476 420 189

#### **Participation/Attendance Requirements:**

- Counsel and other parties in interest who plan to actively participate in the hearing are encouraged to attend the hearing in the WebEx video mode using the WebEx video link above. Counsel and other parties in interest who will not be seeking to introduce any evidence at the hearing and who wish to attend the hearing in a telephonic only mode may attend the hearing in the WebEx telephonic-only mode using the WebEx dial-in and access code above.
- Attendees should join the WebEx hearing at least 10 minutes prior to the hearing start time. Please be advised that a hearing may already be in progress. During hearings, participants are required to keep their lines on mute at all times that they are not addressing the Court or otherwise actively participating in the hearing. The Court reserves the right to disconnect or place on permanent mute any attendee that causes any disruption to the proceedings. For general information and tips with respect to WebEx participation and attendance, please see Clerk's Notice 20-04: [https://www.txnb.uscourts.gov/sites/txnb/files/hearings/Webex%20Information%20and%20Tips\\_0.pdf](https://www.txnb.uscourts.gov/sites/txnb/files/hearings/Webex%20Information%20and%20Tips_0.pdf)
- **Witnesses are required to attend the hearing in the WebEx video mode, and live testimony will only be accepted from witnesses who have the WebEx video function activated.** Telephonic testimony without accompanying video will not be accepted by the Court. The Court may consider special requests for other appearance options on a case-by case-basis.
- All WebEx hearing attendees are required to comply with Judge Hale's Telephonic and Videoconference Hearing Policy (included within Judge Hale's Judge-Specific Guidelines): <https://www.txnb.uscourts.gov/content/judge-harlin-d-hale>

#### **Exhibit Requirements:**

- Any party intending to introduce documentary evidence at the hearing must file an exhibit list in the case with a true and correct copy of each designated exhibit filed as a separate, individual attachment thereto so that the Court and all participants have ready access to all designated exhibits.

#### **Notice of Hearing Content and Filing Requirements:**

**IMPORTANT:** For all hearings that will be conducted by WebEx only:

- The Notice of Hearing filed in the case and served on parties in interest must: (1) provide notice that the hearing will be conducted by WebEx videoconference only, (2) provide notice of the above WebEx video participation/attendance link, and (3) attach a copy of these WebEx Hearing Instructions or provide notice that they may be obtained from Judge Hale's hearing/calendar site: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-hales-hearing-dates>
- When electronically filing the Notice of Hearing via CM/ECF select "at https://us-courts.webex.com/meet/hale" as the location of the hearing (note: this option appears immediately after the first set of Wichita Falls locations). Do not select Judge Hale's Dallas courtroom as the location for the hearing.

### **CONNECTION INSTRUCTIONS FOR PARTICIPATING IN A WEBEX VIRTUAL HEARING**

The court will allow participation in a virtual hearing using either of the following two methods. Please connect at least 10 minutes prior to the hearing time. It is recommended that attorneys discuss the logistics of the WebEx appearance with their clients/witnesses at least 48 hours before the hearing.

#### **Option 1: Using the WebEx app on your smartphone, tablet, laptop, or desktop.**

Please connect using only one device. Using two or more devices may cause audio feedback issues.

If using a phone or tablet for video, it should be set in a stationary position. Holding a phone or tablet in your hand while speaking does not yield a good video for the court.

**NOTE: If you are experiencing audio issues when using the WebEx application,** you may use the “Call Me At” selection under “Audio Connection” to move just the audio portion of the WebEx conference to your telephone.

#### **Option 2: Call in via phone (audio only).**

Webex dial-in number: 1-650-479-3207 (access code: 476 420 189).

### **HELPFUL HINTS AND ETIQUETTE**

- Please use the mute function when you are not speaking. Please be aware that sometimes the court mutes everyone when there is background noise. When you want to speak, make sure you are not on mute. Call-in users should dial \*6 to unmute your line.
- Remember to state your name for the record each time before speaking and speak slowly and clearly so the Court can get a good record.
- Use headphones whenever possible, especially if using a desktop PC with external speakers. We have found that newer iPhones provide the best visual and audio feed – better than most desktop computers. If you are on a personal computer, headphones or earbuds are required for those who need to speak during the hearing.
- During examination, attorneys and witnesses should use a separate camera and microphone when possible. To avoid feedback, parties using separate devices must not be in the same room. The Court may consider special requests on a case-by-case basis.
- WebEx participants may use the "share" button to easily share their screen or document with the Court or other WebEx participants. Press “stop sharing” to remove the presentation from the meeting.
- When making an appearance from a vehicle, please park in a safe location with windows rolled up (to minimize background distraction and noise) and use a headset that is ear-to-phone (not the vehicle’s hands-free speaker-phone option).
- Suggestions for participating in a WebEx hearing from home: If you are having connectivity problems, turn off devices that may be using bandwidth on your home network. Devices or applications such as Facetime, Roku, streaming media players, video games, or large downloads can negatively impact the audio and video quality of the WebEx meeting.
- Participants are reminded that they should wear attire suitable for court.
- Participants who wish to test their WebEx connection or the share screen functionality in advance of the hearing may arrange a “practice run” by contacting the courtroom deputy.

### **EXHIBITS AND DEMONSTRATIVE AIDS**

Exhibits should be filed ahead of time by the date that they would normally be exchanged pursuant to our local rules using the "list (witness/exhibit/generic)" OR "notice (generic)" OR "Support/Supplemental

Demonstrative aids and Power Points should also be filed prior to the hearing, if possible. If not, WebEx has the ability to allow you to share your screen, or a particular document, with everyone in the hearing. If these documents are admitted as exhibits, they would then have to be filed after the hearing.

During the hearing, lawyers can refer to (and offer) their exhibits by referencing the exhibit's docket number for the court and all to access. After the hearing, the court will create a Minute Entry reflecting which exhibits were admitted. You should consider emailing exhibits to witnesses ahead of time since they may not have access to PACER.

**In re: Sea Girt LLC - Case No. 21-30080**  
**In re: National Rifle Association of America - Case No. 21-30085**

**MASTER SERVICE LIST**

**Debtor/Debtor's Counsel**

National Rifle Association of America  
11250 Waples Mill Road  
Fairfax, VA 22030

**Neligan LLP**  
Attn: Patrick J. Neligan  
Douglas J. Buncher  
John D. Gaither  
325 N. St. Paul, Suite 3600  
Dallas, TX 75201  
Email: [pneligan@neliganlaw.com](mailto:pneligan@neliganlaw.com)  
[dbuncher@neliganlaw.com](mailto:dbuncher@neliganlaw.com)  
[jgaither@neliganlaw.com](mailto:jgaither@neliganlaw.com)

Sea Girt LLC  
11250 Waples Mall Road  
Fairfax, VA 22030

**Garman Turner Gordon LLP**  
Attn: Gregory E. Garman  
William M. Noall  
Gabrielle A. Hamm  
7251 Amigo Street, Suite 210  
Las Vegas, Nevada 89119  
Telephone: 725-777-3000  
Facsimile: 725-777-3112  
Email: [ggarman@gtg.legal](mailto:ggarman@gtg.legal)  
[wnoall@gtg.legal](mailto:wnoall@gtg.legal)  
[gamm@gtg.legal](mailto:gamm@gtg.legal)

**U.S. Trustee**

Office of the United States Trustee  
Attn: Lisa Young  
Earle Cabell Federal Building  
1100 Commerce Street, Room 976  
Dallas, TX 75242

**Secured Creditors**

Atlantic Union Bank  
Attn: Andrew Kalin  
1800 Robert Fulton Drive, Suite 100  
Reston, VA 20191  
Email: [andrew.kalin@atlanticunionbank.com](mailto:andrew.kalin@atlanticunionbank.com)

**Counsel For Official Committee of Unsecured Creditors**

Louis R. Strubeck, Jr.  
Kristian W. Gluck  
Scott P. Drake  
Laura L. Smith  
Nick Hendrix  
Norton Rose Fulbright US LLP  
2200 Ross Avenue, Suite 3600  
Dallas, TX 75201-7932  
[louis.strubeck@nortonrosefulbright.com](mailto:louis.strubeck@nortonrosefulbright.com)  
[kristian.gluck@nortonrosefulbright.com](mailto:kristian.gluck@nortonrosefulbright.com)  
[laura.smith@nortonrosefulbright.com](mailto:laura.smith@nortonrosefulbright.com)  
[scott.drake@nortonrosefulbright.com](mailto:scott.drake@nortonrosefulbright.com)  
[nick.hendrix@nortonrosefulbright.com](mailto:nick.hendrix@nortonrosefulbright.com)

**20 Largest Unsecured Creditors**

Ackerman McQueen, Inc.  
1601 Northwest Expressway  
Oklahoma City, OK 73118-1438

Membership Marketing Partners LLC  
11250 Waples Mill Road, Suite 310  
Fairfax, VA 22030

Gould Paper Corporation  
Attn: Warren Connor  
99 Park Avenue, 10<sup>th</sup> Floor  
New York, NY 10016

Infocision Management Corp.  
325 Springside Drive  
Akron, OH 44333

Under Wild Skies  
c/o Dycio & Biggs  
10533 Main Street  
Fairfax, VA 22030

Valtim Incorporated  
P.O. Box 114  
Forest, VA 24551

Quadgraphics  
N63W23075 Hwy. 74  
Sussex, WI 53089

Communications Corp of America  
Attn: Ken Bentley  
13129 Airpark Drive, Suite 120  
Elkwood, VA 22718

Membership Advisors Public REL  
11250 Waples Mill Road, Suite 310  
Fairfax, VA 22030

Salesforce.Com, Inc.  
One Mark St. – The Landmark, Suite 300  
San Francisco, CA 94105

Mercury Group  
1601 NW Expressway, Suite 1100  
Oklahoma City, OK 73118

Speedway Motorsports, Inc.  
P.O. Box 600  
Concord, NC 28026



Image Direct Group LLC  
200 Monroe Avenue, Building 4  
Frederick, MD 21701

Google  
1600 Amphitheatre Parkway  
Mountain View, CA 94043-1351

TMA Direct, Inc.  
12021 Sunset Hills Road, Suite 350  
Manassas, VA 20109

United Parcel Services  
P.O. Box 7247-0244  
Philadelphia, PA 19170

Membership Advisors Fund Raising  
11250 Waples Mill Road, Suite 310  
Fairfax, VA 22030

Stone River Gear, LLC  
P.O. Box 67  
Bethel, CT 06801

Krueger Associates, Inc.  
105 Commerce Drive  
Aston, PA 19014

CDW Computer Centers, Inc.  
P.O. Box 75723  
Chicago, IL 60675

#### **Government Agencies**

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Office of Attorney General (NY)  
Attn: Letitia James  
28 Liberty Street  
New York, NY 10005

Office of Attorney General (DC)  
Attn: Karl A. Racine  
441 Fourth St., N.W., Suite 600-South  
Washington, DC 20001

Office of Attorney General (TX)  
Attn: Ken Paxton  
P.O. Box 12548  
Austin, TX 78711-2548

Mahmooth A. Faheem  
Lori A. Butler  
Pension Benefit Guaranty Corporation  
1200 K NW  
Washington, DC 20005-4026  
[mahmooth.faheem@pbgc.gov](mailto:mahmooth.faheem@pbgc.gov)  
[butler.lori@pbgc.gov](mailto:butler.lori@pbgc.gov)  
[efile@pbgc.gov](mailto:efile@pbgc.gov)

#### **Notice of Appearance**

Laurie A. Spindler  
Linebarger Coggan Blair & Sampson, LLP  
2777 N. Stemmons Freeway, Suite 1000  
Dallas, TX 75207  
[dallas.bankruptcy@publicans.com](mailto:dallas.bankruptcy@publicans.com)

G. Michael Gruber  
Dorsey & Whitney LLP  
300 Crescent Court, Suite 400  
Dallas, TX 75201  
[gruber.mike@dorsey.com](mailto:gruber.mike@dorsey.com)

Brian E. Mason  
Dorsey & Whitney LLP  
300 Crescent Court, Suite 400  
Dallas, TX 75201  
[mason.brian@dorsey.com](mailto:mason.brian@dorsey.com)

Natalie L. Arbaugh  
Winston & Strawn LLP  
2121 N. Pearl Street, Suite 900  
Dallas, TX 75201  
[narbaugh@winston.com](mailto:narbaugh@winston.com)

David Neier  
Winston & Strawn LLP  
200 Park Avenue  
New York, NY 10166-4193  
[dneier@winston.com](mailto:dneier@winston.com)

Michael I. Baird  
Pension Benefit Guaranty Corporation  
1200 K St. NW  
Washington, DC 20005-4026  
[baird.michael@pbgc.gov](mailto:baird.michael@pbgc.gov)  
[efile@pbgc.gov](mailto:efile@pbgc.gov)

Gerritt M. Pronske  
Eric M. Van Horn  
Jason P. Kathman  
Spencer Fane LLP  
2200 Ross Avenue, Suite 4800 West  
Dallas, TX 75201  
[gpronske@spencerfane.com](mailto:gpronske@spencerfane.com)  
[ericvanhorn@spencerfane.com](mailto:ericvanhorn@spencerfane.com)  
[jkathman@spencerfane.com](mailto:jkathman@spencerfane.com)

Mark Ralston  
Fishman Jackson Ronquillo PLLC  
Three Galleria Tower  
13155 Noel Road, Suite 700  
Dallas, TX 75240  
[mrалston@fjrpllc.com](mailto:mrалston@fjrpllc.com)

H. Joseph Acosta  
Dorsey & Whitney LLP  
300 Crescent Court, Suite 400  
Dallas, TX 75201  
[acosta.joseph@dorsey.com](mailto:acosta.joseph@dorsey.com)

Thomas M. Buchanan  
Matthew Saxon  
Winston & Strawn LLP  
1901 L St., N.W.  
Washington, DC 20036  
[tbuchana@winston.com](mailto:tbuchana@winston.com)  
[msaxon@winston.com](mailto:msaxon@winston.com)

Tara LeDay  
McCreary, Veselka, Bragg & Allen, P.C.  
P.O. Box 1269  
Round Rock, TX 78680  
[tleday@mvalaw.com](mailto:tleday@mvalaw.com)

Brandon R. Freud  
Chuhak & Tecson, P.C.  
30 S. Wacker Drive, Suite 2600  
Chicago, IL 60606  
[bfreud@chuhak.com](mailto:bfreud@chuhak.com)

James Sheehan  
Emily Stern  
Monica Connell  
Office of Letitia James  
Attorney General for the State of New York  
28 Liberty Street  
New York, NY 10005  
[james.sheehan@ag.ny.gov](mailto:james.sheehan@ag.ny.gov)  
[emily.stern@ag.ny.gov](mailto:emily.stern@ag.ny.gov)  
[monica.connell@ag.ny.gov](mailto:monica.connell@ag.ny.gov)

Kevin T. White  
Director – Legal  
Quad/Graphics, Inc.  
601 Silveron Blvd., Suite 200  
Flower Mound, TX 75028  
[ktwhite@quad.com](mailto:ktwhite@quad.com)

Robert Lapowsky  
Stevens & Lee, P.C.  
620 Freedom Business Center, Suite 200  
King of Prussia, PA 19406  
[rl@stevenslee.com](mailto:rl@stevenslee.com)

Joe E. Marshall  
Marshall Law  
2626 Cole Avenue, Suite 300  
Dallas, TX 75204  
[jmarshall@marshalllaw.net](mailto:jmarshall@marshalllaw.net)

M. Jermaine Watson  
Joshua N. Eppich  
H. Brandon Jones  
Clay M. Taylor  
J. Robertson Clarke  
Bonds Ellis Eppich Schafer Jones LLP  
420 Throckmorton Street, Suite 1000  
Fort Worth, TX 76102  
[jermaine.watson@bondsellis.com](mailto:jermaine.watson@bondsellis.com)  
[joshua@bondsellis.com](mailto:joshua@bondsellis.com)  
[clay.taylor@bondsellis.com](mailto:clay.taylor@bondsellis.com)  
[brandon@bondsellis.com](mailto:brandon@bondsellis.com)  
[robbie.clarke@bondsellis.com](mailto:robbie.clarke@bondsellis.com)

Arthur A. Greenberg  
G&B Law, LLP  
16000 Ventura Boulevard, Suite 100  
Encino, CA 91436-2730  
[agreenberg@gblawllp.com](mailto:agreenberg@gblawllp.com)

Stephen G. Wilcox  
Wilcox Law, PLLC  
P.O. Box 201849  
Arlington, TX 76006  
[swilcox@wilcoxlaw.com](mailto:swilcox@wilcoxlaw.com)

David W. Giattino  
Stevens & Lee, P.C.  
919 Market Street, Suite 1300  
Wilmington, DE 19801  
[dwg@stevenslee.com](mailto:dwg@stevenslee.com)

Duane M. Geck  
Donald H. Cram  
Severson & Werson, P.C.  
One Embarcadero Center, Suite 2600  
San Francisco, CA 94111  
[dmg@severson.com](mailto:dmg@severson.com)  
[dhc@severson.com](mailto:dhc@severson.com)

Judith W. Ross  
Ross & Smith, PC  
700 North Pearl Street, Suite 1610  
Dallas, TX 75201  
[judith.ross@judithwross.com](mailto:judith.ross@judithwross.com)

Nancy L. Alper  
Senior Assistant Attorney General  
Office of the Attorney General  
for the District of Columbia  
400 Sixth Street, N.W., 9<sup>th</sup> Floor  
Washington, DC 20001  
[nancy.alper@dc.gov](mailto:nancy.alper@dc.gov)

Catherine Jackson  
Assistant Attorney General  
Office of the Attorney General for  
The District of Columbia  
400 Sixth Street, N.W. 10<sup>th</sup> Floor  
Washington, DC 20001  
[catherine.jackson@dc.gov](mailto:catherine.jackson@dc.gov)

Leonor Miranda  
Assistant Attorney General  
Office of the Attorney General For  
The District of Columbia  
400 Sixth Street, N.W. 10<sup>th</sup> Floor  
Washington, DC 20001  
[leonor.miranda@dc.gov](mailto:leonor.miranda@dc.gov)

D. Brett Marks  
Akerman LLP  
201 East Olas Blvd., Suite 1800  
Fort Lauderdale, FL 33301  
[brett.marks@akerman.com](mailto:brett.marks@akerman.com)

Heather M. Crockett  
Deputy Attorney General  
Indiana Office of Attorney General  
302 W. Washington St., IGCS – 5<sup>th</sup> Floor  
Indianapolis, IN 46204  
[heather.crockett@atg.in.gov](mailto:heather.crockett@atg.in.gov)

David W. Parham  
Akerman LLP  
2001 Ross Avenue, Suite 3600  
Dallas, TX 75201  
[david.parham@akerman.com](mailto:david.parham@akerman.com)

Walter A. Herring  
Robert Blackwell  
Blackwell, Blackburn, Herring & Singer LLP  
7557 Rambler Road, Suite 1450  
Dallas, TX 75231  
[wherring@bbhslp.com](mailto:wherring@bbhslp.com)  
[bblackwell@bbhslp.com](mailto:bblackwell@bbhslp.com)

James F. Chiu  
Deputy Attorney General  
Indiana Office of Attorney General  
302 W. Washington St., IGCS – 5<sup>th</sup> Floor  
Indianapolis, IN 46204  
[james.chiu@atg.in.gov](mailto:james.chiu@atg.in.gov)